

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

Statesville DIVISION

DOCKET NO. 5:23-cv-00059-KDB-DCK

CROWN EQUIPMENT CORPORATION,

Plaintiff,

vs.

DAVID BRADY, et al.

Defendant.

MOTION FOR ADMISSION
PRO HAC VICE
and AFFIDAVIT

NOW COMES Abbi White Harris, Esq. (“Local Counsel”), a member in good standing with the Bar with the United States District Court for the Western District of North Carolina (“WDNC”), and moves for the admission of Andrew P. Connors, Esq. (“Applicant”), who seeks permission to represent Defendants David Brady; William Tucker; Brawtus Holding Company, Inc.; and Brawtus Management Company, LLC

_____ (“Client”) in this above-captioned case.

By signing this motion, Local Counsel and Applicant certify that:

1. Applicant is a member in good standing of the bar of the highest court of the State or of the District of Columbia where Applicant regularly practices law, which is Virginia _____.

2. Applicant practices under the name of or as a member of the following firm:

Firm Name: Darkhorse Law PLLC dba Darkhorse Attorneys

Mailing Address: 7331 Timberlake Road, Suite 201A

City / State / Zip: Lynchburg, Virginia 24502

Telephone Number: 800-279-4292 **Facsimile Number:** 540-301-6460

Email Address (required): info@darkhorse.law

3. Applicant certifies that s/he is also admitted to practice before and remains in good standing with the Courts in the following jurisdictions:

Virginia

4. Applicant certifies s/he has never been the subject of any formal suspension or disbarment proceedings; never been denied admission *pro hac vice* in this or any other jurisdiction or had *pro hac vice* admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and has never received public discipline by any court or lawyer regulatory organization. If Applicant cannot so certify, the applicant has attached a separate explanation including particular information disclosing the disciplinary history or the denial of admission.

5. Applicant certifies that the client requested Applicant to represent it in this matter, along with Local Counsel.

6. Applicant agrees to be subject to the Orders of the WDNC, including the Local Rules of the WDNC, and amenable to the disciplinary action and the civil jurisdiction of the WDNC in all respects as if the applicant were a regularly admitted and licensed member of the Bar of this Court in good standing.

7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the WDNC.

8. Local Counsel has conferred with counsel for the other parties, who have indicated they *do not* oppose this motion.

9. The required fee for admission *pro hac vice* is being submitted with the filing of this motion.

10. Applicant consents to electronic notification.

By signing this Motion, we so certify.

This, the 28th day of June, 2023.



Local Counsel

/AndrewPConnors/

Applicant

Attorney Name Abbi White Harris, Esq.

Bar Number 59883

Firm Name Darkhorse Attorneys

Firm Address 7331 Timberlake Road, Suite 201A

Firm City / State / Zip Lynchburg, Virginia 24502

Telephone Number 800-279-4292

Fax Number 540-301-6460

Email Address abbi@darkhorse.law

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served the foregoing on the following counsel of record who are CM/ECF participants:

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*Counsel for Defendants Brady,
Tucker, Brawtus Holding, Inc., and
Brawtus Management LLC*